



HMIS Document

# **FL-507 CONTINUUM OF CARE HMIS POLICIES & PROCEDURES**

Homeless Services Network of Central Florida

142 E. Jackson St.

Orlando, FL 32801

Phone: (407) 893-0133

Fax: (407) 893-5299

[www.hsncfl.org](http://www.hsncfl.org)

## Table of Contents

Purpose	3
Glossary	3
Introduction to HMIS Policies & Procedures	4
HMIS Benefits	5
Benefits for service providers	5
Benefits for persons experiencing homelessness	5
Benefits for policy makers	5
Roles and Responsibilities	6
HMIS Advisory Committee	6
HMIS Software Vendor	6
HMIS Lead Agency	7
HMIS System Administrators	8
HMIS Agency Liaisons	8
HMIS End Users	9
Participation Requirements	10
Participation Agreement Documents	10
HMIS Agency Liaison	10
HMIS End Users	10
System Access Requirements for End Users	10
User Training Requirements	10
Usernames	11
Passwords	11
Entering Data into HMIS	11
Tracking of Unauthorized Access	11
Client Consent Forms	11
Data Protocols	11
HMIS User Roles and Access	12
Minimum Technical Standards	12
HMIS License Fees & Other Associated Costs	12
Violations of HMIS Operating Policies	13
Notification of HMIS Lead Agency of Violations	13
Violations of Local, State or Federal Law	14
Multiple Violations within a 12 month Timeframe	14
Client Rights	15

Client Consent	15
Client Access to HMIS Information	15
Filing a Grievance	15
Revoking Authorization for HMIS Data Sharing	15
Case Notes & Data Discrepancies	15
Privacy and Security	16
Privacy Plan	16
Security Plan	16
Data Requirements	17
Minimum Data Collection Standard	17
Provider/Project Naming Convention	17
Data Quality Plan	17
XML & CSV Imports	18
HMIS Data Protection	18
Data Reporting Parameters and Guidelines	18
Data Use & Research	19
CoC Reporting	19
Research Projects	19
Data Use Restrictions	19
Solicitation	20
Selling of HMIS Data	20
Public Use of HMIS Data	20
Document History	21
Appendices	22

## Purpose

This is the proposed official HMIS Policies document for the Central Florida Continuum of Care FL-507. This document includes guidelines and standards that govern HMIS operations, decision making and accountability of the HMIS Advisory Committee under the guidance of the CoC Board and HMIS Lead Agency, as well as the responsibilities of System Administrators, Agency Liaisons and end-users who access HMIS.

## Glossary

This glossary includes a list of terms that will be used throughout this document and by the HMIS staff.

HUD.....	Acronym used to refer to the Department of Housing and Urban Development
HSN.....	Acronym for Homeless Services Network
HMIS.....	Acronym for Homeless Management Information System
HIPAA .....	Acronym for Health Information Portability and Accountability Act
CoC.....	Acronym for Continuum of Care
Agency Liaison (AL) .....	A person designated by a CoC Member Agency Executive Director/Chief Executive Officer who acts as a liaison and contact person to the HMIS staff
System administrator.....	Staff at the HMIS Lead Agency who are responsible for overseeing HMIS users and system use/access within the Central Florida Continuum of Care FL-507. The System Administrators allow user HMIS access, provide end user training, ensure user compliance with HMIS policies and procedures, and make policy recommendations to the Central Florida Continuum of Care FL-507 HMIS Advisory Committee.
Partner Agency .....	An agency who has signed all HMIS agreements and who is actively entering data into the system
MOU.....	Acronym for Memorandum of Understanding
HMIS User.....	Any system user who has an active ServicePoint license. This can include Agency Administrators
AHAR .....	Acronym for Annual Homeless Assessment Report. This national report is submitted by HUD to Congress every summer.
LSA.....	Acronym for Longitudinal Systems Analysis. This is the report submitted by the CoC to HUD for inclusion in the AHAR.
NOFO.....	Acronym for Notice of Funds Opportunity.

## Introduction to HMIS Policies & Procedures

The Central Florida Continuum of Care FL-507 (CoC) is the region's strategic approach to the organization and delivery of services to people who are homeless in Orange, Seminole, Osceola Counties and participating Partner Agencies. The Homeless Management Information System (HMIS) is an internet-based database that is used by homeless service organizations across Central Florida to record and store client information about the numbers, characteristics and needs of homeless persons and those at risk of homelessness. The current HMIS software vendor is Eccovia Inc., chosen by the HMIS Advisory Committee. Eccovia Inc. administers the central server and HMIS software. The Homeless Services Network of Central Florida (HSN) administers user and agency licensing, training and compliance for the CoC.

HMIS enables service providers to measure the effectiveness of their interventions and facilitate longitudinal analysis of service needs and gaps at an agency and CoC level. Information that is gathered from consumers via interviews conducted by service providers is analyzed for an unduplicated count, aggregated (void of any identifying client level information) and made available to policy makers, service providers, advocates, and consumer representatives. Data aggregated from HMIS about the extent and nature of homelessness in the Central Florida Continuum of Care FL-507 is used to inform public policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

Guidance for the implementation of the Central Florida Continuum of Care FL-507 HMIS is provided by a broad-based Advisory Committee representative of the CoC and is committed to understanding the gaps in services to consumers of the human service delivery system in an attempt to prevent and end homelessness.

This document provides the policies and procedures that govern HMIS operations, as well as the responsibilities for System Administrators, Agency Liaisons, end users and all others who access the Central Florida Continuum of Care FL-507 HMIS.

## HMIS Benefits

Use of HMIS provides numerous benefits for persons experiencing homelessness, service providers, and the Central Florida Continuum of Care FL-507.

### Benefits for service providers

- Provides online real-time information about client needs and the services available for homeless persons.
- Assures confidentiality by providing information in a secured system.
- Decreases duplicative client intakes and assessments.
- Tracks client outcomes and provides a client service history.
- Generates data reports for local use, and for state and federal reporting requirements.
- Facilitates the coordination of services within an organization and with other agencies and projects.
- Better able to define and understand the extent of homelessness throughout Central Florida Continuum of Care FL-507.
- Enhanced ability to focus staff and financial resources where services for homeless persons are needed the most.
- Improve capacity to evaluate the effectiveness of specific interventions and specific projects and services provided.

### Benefits for persons experiencing homelessness

- Intake information and needs assessments are maintained historically, reducing the number of times homeless persons must repeat their stories to multiple service providers.
- The HMIS system provides an opportunity for an intake and life history to be recorded one time. This demonstrates that service providers consider the time of the client as valuable and restores some of the client's dignity.
- Multiple services can be easily coordinated and referrals can be streamlined and tracked over time.

### Benefits for policy makers

- Better able to define and understand the extent of homelessness throughout the region.
- Better able to focus staff and financial resources to the agencies and projects in geographical areas where services for homeless persons are needed the most.
- Better able to evaluate the effectiveness of specific interventions and specific projects and services provided.
- Better able to provide the Florida Legislature, Congress, Department of Housing and Urban Development (HUD), the Florida Department of Children and Families, and other state and federal agencies with data and information on the homeless population in Central Florida.
- Better able to meet all federal and other reporting requirements.

## Roles and Responsibilities

### HMIS Advisory Committee

The Central Florida Continuum of Care FL-507 HMIS Advisory Committee is responsible for providing counsel and assistance to the staff members and governing bodies of contributing providers within each of the three participating counties on all matters regarding HMIS. The responsibilities of the Advisory Committee include but are not limited to the following:

- Under the oversight of the CoC Board and in accordance with the CoC Governance Charter, participate in decision-making and recommend policies and procedures regarding the CoC HMIS database implementation.
- Collaborate and support CoC HMIS activities.
- Disseminate information about the HMIS database, the Advisory Committee and its activities, policies, and procedures.
- Provide counsel and assistance to HMIS staff.
- Identify, develop, and implement strategies for improving HMIS coverage and data quality throughout the geographic region of Central Florida Continuum of Care FL-507.
- Provide support to the CoC in their efforts to identify and diminish potential barriers to the use and improvement of the HMIS database.
- Ensure the HMIS scope is in alignment and compliance with the requirements of HUD, partner agencies, and other stakeholder groups.
- Address any issue that has major implications for the HMIS, such as policy mandates from HUD or performance problems with the HMIS vendor.
- Periodically review, revise, and submit to the CoC Board for approval a privacy plan, a security plan, and a data quality plan for HMIS.

The following specific procedures are used to describe the operation of the HMIS Advisory Committee:

- Meetings: The HMIS Advisory Committee shall meet at least quarterly. Meeting minutes shall be taken and shared with all Partner Agencies.
- Communications: The HMIS Advisory Committee shall provide timely communications on all activities of the Committee to the CoC Board as requested and to all Partner Agencies.
- Strategic Planning: The HMIS Advisory Committee shall develop and maintain strategic planning activities to support CoC plans and activities. The strategic planning activities shall be reviewed and approved by the CoC Board. This includes, but is not limited to, a privacy plan, a security plan and a data quality plan.
- Reporting: The HMIS Advisory Committee shall review all reports prior to submission for CoC Board review and/or release to the public.

### HMIS Software Vendor

The HMIS Software Vendor is responsible for maintaining and improving our software implementation, based upon HUD requirements and customer reported bugs or issues. The following

tasks are required to be completed by our software vendor. Implementation of these procedures is the sole responsibility of our vendor. The HMIS Lead Agency shall audit these tasks at least twice per fiscal year.

- Design and maintain the HMIS to meet HUD HMIS Data Standards.
- Provide ongoing support to the HMIS project team pertaining to needs of end-users, to mine the database, generate HUD required reports and other end-user interface needs.
- Administer the production servers including web and database servers.
- Monitor access to HMIS through auditing.
- Monitor functionality, speed and database backup procedures.
- Provide backup and recovery of internal and external data.
- Provide HMIS system availability twenty-four hours a day, seven days a week.
- Communicate any planned or unplanned interruption of service to the HMIS Program Manager.

The HMIS Lead Agency shall utilize a standard HMIS Vendor Monitoring Tool. This tool comes from the HUD Exchange website and can be located here:

<https://files.hudexchange.info/resources/documents/HMIS-Software-Vendor-Monitoring-Tool.pdf>.

Provide annual results to CoC Operating Board for review and approval.

## HMIS Lead Agency

The HMIS Lead Agency has several responsibilities to the CoC. These responsibilities include but are not limited to:

- Oversee all contractual agreements with funders and data collection activities by participating organizations and consultants in adherence to adopted HMIS policies and procedures.
- Monitor compliance of Partner Agencies with contract requirements and deliverables.
- Communicate with participating organization leadership and other stakeholders regarding HMIS.
- Authorize usage and access to HMIS for users who need access to the system for technical administration, data entry, editing of client records, viewing of client records, report writing, or administration of essential activities associated with carrying out HMIS responsibilities.
- Respond to information requests of participating organizations, funders and the community.
- Serve as the applicant to HUD for any HMIS grants that will cover the Continuum of Care geographic area.

The following specific procedure is used to evaluate the operation of the HMIS Lead Agency. The CoC determines when the HMIS Lead Agency is monitored and selects the vendor to perform the monitoring. An example tool the vendor can use is the HMIS Lead Improvement Evaluation Matrix. This document is located on the HUD Exchange website at:

<https://files.hudexchange.info/resources/documents/HMIS-Lead-Improvement-Evaluation-Matrix.pdf>

The vendor shall provide monitoring results to CoC Operating Board for review and approval.



## HMIS System Administrators

The HMIS Lead Agency retains System Administration staff that provides end-user training and ensures that these Policies are upheld by each Partner Agency and end users. System Administrators are responsible for the following:

- Provide representation on CoC HMIS Advisory Committee.
- Have full and complete access to all HMIS system software features and functions.
- Run reports for delivery to the CoC according to local, state and federal funding requirements.
- Can inactivate clients, and delete incorrect/inaccurate client information (such as needs or services) created across organizations.
- Provide Agency Liaisons and end users with the most up-to-date information regarding changes with data collection requirements.
- Document work on the database.
- Document the development of reports/queries.
- Provide technical assistance as needed with project sites.
- Provide training and technical assistance to Partner Agencies and government organizations on policies and procedures, system use, and reporting.
- Respond to questions from users.
- Coordinate technical support for HMIS system software.
- Communicate problems with data entry/quality to participating organizations.
- Monitor agency participation including timeliness and completeness of data entry as defined by the CoC FL-507 HMIS Data Quality Plan.
- Communicate any planned or unplanned interruption in service.
- Audit policy and procedure compliance as defined by the CoC FL-507 HMIS Agency Monitoring Plan.
- Complete an annual security review as defined by the CoC FL-507 HMIS Security Plan.

The following specific procedure is used to evaluate the effectiveness of the HMIS System Administrators. The CoC determines when the HMIS System Administrators are monitored and selects the vendor to perform the monitoring.

- Complete the HMIS System Administrator Checklist and review annually thereafter. An example tool the vendor can use is the HMIS System Administrator Checklist. This document is located on the HUD Exchange website at:

<https://files.hudexchange.info/resources/documents/HMIS-System-Administrator-Checklist.pdf>

## HMIS Agency Liaisons

Each agency that participates in HMIS shall designate at least one Agency Liaison. The role of the Agency Liaison is to be primary contact between the agency and the HMIS System Administrators for all HMIS related activities. Agency Liaisons are responsible for the following:

- Review agency information in HMIS and provide updates/corrections to HMIS System Administrators.

- Ensure that the participating agency obtains a unique user license for each user at the agency to maintain security and integrity of client information as specified within the CoC FL-507 HMIS Data Security Plan.
- Maintain a minimum standard of data quality by reviewing Data Quality Reports and ensuring all the HUD Universal Data Elements and Program-Specific Data Elements are complete and accurate for every individual served by the agency and entered into HMIS as specified within the CoC FL-507 HMIS Data Quality Plan.
- Ensure agency staff persons receive required HMIS training, and review the CoC FL-507 HMIS Policies & Procedures, the CoC FL-507HMIS Partner Agreement and any agency policies which impact the security and integrity of client information.
- Ensure that HMIS access is granted only to staff members that have received training, have completed the CoC FL-507 HMIS End-User Agreement and are authorized to use HMIS.
- Grant technical access to HMIS for persons authorized by the System Administrators by providing guidance to users outside of the CoC's required trainings.
- Notify all users at their agency of interruptions in service.
- Provide a single point of communication between users and HMIS staff.
- Review and understand all correspondence sent by the HMIS Lead Agency.
- Administer and monitor data security policies and standards including:
  - User Access Control
  - Detecting and responding to violations of HMIS policies, procedures or agency procedures.
  - Report any and all security violations to HMIS Lead Agency and the HMIS System Administrators.

## HMIS End Users

End users includes all persons authorized to view or edit data with HMIS. All end users must have a license to access HMIS. End users are responsible for the following:

- Take appropriate measures to prevent unauthorized data disclosure.
- Report any security violations.
- Comply with relevant policies and procedures.
- Input required data fields in a timely manner as outlined in the CoC FL-507 HMIS Data Quality Plan.
- Ensure a minimum standard of data quality by accurately answering all the HUD Universal Data Elements, Program-Specific Data Elements and all custom data fields specified by the CoC for every individual entered into HMIS. See also "Data Protocols" section below.
- Inform clients about the agency's use of their data in HMIS.
- Take responsibility for any actions undertaken with one's username and password.
- Complete required training and all assignments associated with training as set forth by HMIS Lead Agency.
- Review and understand all correspondence sent by the HMIS Lead Agency.
- Report any and all security violations to the HMIS Agency Liaison(s) for your agency.

# Participation Requirements

## Participation Agreement Documents

Partner Agencies must complete and submit the following documents to HMIS Lead Agency:

- **HMIS Partnership Agreements** must be signed by each participating agency's Executive Director. The HMIS Lead Agency will retain the original document. The participation agreement states the agency's commitment to adhere to the policies and procedures for effective use of HMIS.
- **HMIS-User Agreements** must be signed by each end user. This document must be signed at time of training by each end user and before access to the HMIS live site is granted.
- **Agency Liaison Agreements** must be signed by all assigned HMIS Agency Liaisons and returned to HMIS Lead Agency before role can be changed in the HMIS live site. A basic Agency Liaison training must be completed prior to role assignment.
- **HMIS User Account Requests** are to be completed by the Agency Liaison of each participating agency and submitted to the HMIS team.

## HMIS Agency Liaison

Agencies must designate at least one person to be HMIS Agency Liaison. Each Agency Liaison must complete the [Agency Liaison Agreement](#) form (listed above) and attend the basic Agency Liaison training prior to activation of this role for the agency.

## HMIS End Users

Each HMIS user must complete all required training as specified in the [HMIS Training Manual](#). At the time of initial training, each HMIS user will complete the [HMIS User Agreement](#) (listed above). Each HMIS user must also complete additional training to retain access to HMIS. The additional training requirements are specified in the [HMIS Training Manual](#).

## System Access Requirements for End Users

The HMIS Lead Agency Staff System Administrators and designated Agency Liaison will determine each user's access level/role prior to training. The Agency Liaison must submit End-User Account requests to the HMIS team via [hmis@hsncfl.org](mailto:hmis@hsncfl.org). Fees per license may apply. Refer to [HMIS License Fees](#) document for CoC specific information on the HMIS fee structure.

The Executive Director (if gaining access to HMIS), Agency Liaison and all users must complete and submit [HMIS User Agreement](#) forms, and complete all necessary training requirements, as outlined by the HMIS Lead Agency before access to the system is granted.

## User Training Requirements

- All new users are required to attend new user training offered by HMIS Lead Agency prior to receiving access to HMIS. If the HMIS System Administration staff determines that data entered by an end user does not meet minimum data quality standards, users may be required to repeat this training.

- All users are required to attend annual privacy and security training to retain their user license.
- All users are required to attend additional HMIS trainings annually per the requirements set forth in the [HMIS Training Manual](#). New user training will not count toward the general training requirements.
- All users that do not access HMIS within a 90-day period will have their account locked. The Agency Liaison and the user will be notified of the lock out. The user will be required to take refresher training to get the user account unlocked.
- The HMIS Lead Agency has outlined specific training requirements as specified in the [HMIS Training Manual](#).

## Username

Each user of HMIS must have a unique username. Our system uses an email address as a username. Since the usernames must be unique, each user must have a unique email address. Re-useable or “generic” usernames, such as “intern@agency.org”, are not allowed. In addition, every user must have an email address associated with the agency, such as “john.smith@agency.org”. Personal email addresses are not allowed as HMIS usernames or connected to an HMIS user account.

## Passwords

Passwords are required for each and every user of the HMIS system. Further details about passwords will be found in the [CoC FL-507 HMIS Security Plan](#) document.

## Entering Data into HMIS

Agencies participating in HMIS must meet minimum data entry requirements established by HUD and its HMIS federal partners. Data must be entered into the system “live” with the client or within three business day of last contact with client. Data for “mandated” projects must follow the data entry guidelines established by the CoC’s Standard Policies for each project type. Refer to the [CoC FL-507 HMIS Data Quality Plan](#) for data quality standard information.

## Tracking of Unauthorized Access

Any suspicion of unauthorized activity must be reported to the HMIS staff immediately.

## Client Consent Forms

In addition to posting the HMIS Privacy Notice, agencies may require clients to sign a client consent form. The Privacy Notice informs clients of the electronic sharing of their personal information with other agencies that participate in HMIS when data sharing is appropriate for client service.

## Data Protocols

Agencies may collect information for data elements in addition to the minimally-required data elements established by HUD and its HMIS federal partners. Agencies must maintain consistency of data collection and entry within each project and communicate with the HMIS System Administrators via [hmis@hsncfl.org](mailto:hmis@hsncfl.org) to ensure data quality of the required data elements. All required data elements are defined in the [CoC FL-507 HMIS Data Quality Plan](#) document.

## HMIS User Roles and Access

Our HMIS Lead Agency has identified five primary roles for access to HMIS. These roles and general descriptions of the capabilities of each role are listed below. Detailed descriptions of each role are available in the [CoC FL-507 HMIS Security Plan](#) document.

- **HMIS Basic:** Users may access all screens and modules except “Administration.” A Case Manager may access all screens within HMIS application, including viewing and editing Client Level information shared within HMIS.
- **HMIS Agency Liaison:** In addition to the level of access as a HMIS Basic user, Agency Liaisons may delete some data created by users within their organization (granted by the HMIS Lead Agency).
- **System Administrator:** There are no system restrictions for this role. They have full HMIS access.
- **Read-Only Access Users:** These users can view, but not edit any screens within the HMIS application. User may access and run reports.

## Minimum Technical Standards

The following specifications apply to end user computers for all HMIS modules and the reporting tools.

- Minimum Computer Requirements:
  - A PC or Mac with a 2 Gigahertz or higher processor, 40 GB hard drive, 2 GB RAM, and Microsoft Windows 7 or higher. For Mac, OSX 10.9 or higher.
  - The most recent version of Google Chrome, Firefox or Internet Explorer. No additional plug-in is required. If using a Mac, use Firefox. It is recommended that your browser have a 128 bit cipher/encryption strength installed. The browser’s cache must be set to “Check for new version of the stored pages: Every visit to page.”
- A broadband Internet connection or LAN connection
- Virus protection updates
- Additional Recommendations for Windows:
  - Computer Memory: 4 GB RAM recommended (2 GB minimum)
  - Screen Display Resolution: 1024 by 768 pixels
  - A Dual-Core processor is recommended

## HMIS License Fees & Other Associated Costs

- Agencies may purchase licenses at any time. Applicable CoC license fees are calculated as outlined in the [HMIS License Fees](#) document. As of the most recent version of this document, the annual cost of a new license and the on-going fees for each existing license allocated to the agency is determined by the Central Florida Continuum of Care FL-507 Board of Directors, guided by recommendations of the HMIS Advisory Committee.
- In the event that a participating agency’s HMIS access is revoked by the CoC, the agency shall not attempt to gain access to the Central Florida Continuum of Care FL-507 HMIS by other means. All HMIS user licenses are to be purchased and maintained (including associated costs) by the HMIS Lead Agency.

- The Central Florida Continuum of Care FL-507 HMIS Advisory Committee will collaborate and implement, maintain and revise the fee structure, as well as the billing procedures, for any costs to participating agencies associated with the use of HMIS. Costs may include, but are not limited to: HMIS license fees, End User training costs or custom reporting fees. Refer to [HMIS License Fees](#) document for CoC specific information on the HMIS fee structure.

## Violations of HMIS Operating Policies

HMIS users and Partner Agencies must abide by all HMIS operational policies and procedures found in the HMIS Policies & Procedures manual (this document), the End User Agreements and the Partner Agency Agreement. Repercussion for any violation will be assessed in a tiered manner. Each user or Partner Agency violation will face successive consequences – the violations do not need to be of the same nature in order to be considered second or third violations. User violations do not expire. No regard is given to the duration of time that occurs between successive violations of the HMIS operational policies and procedures as it relates to corrective action.

Any user or other fees paid by the Partner Agency will not be returned if a user's or Partner Agency's access to HMIS is revoked due to violation of operating policies. The appropriate funder of the agency shall be notified of any operating policies violation that is not remedied in the allotted timeframe or if a Partner Agency's HMIS access is revoked.

The following specific procedures and penalties are used:

- First Violation – The user and Partner Agency will be notified of the violation in writing by the HMIS Lead Agency. The user's license will be suspended for 30 days, or until the Partner Agency notifies HMIS Lead Agency of action taken to remedy the violation. The HMIS Lead Agency will provide necessary training to the user and/or Partner Agency to ensure the violation does not continue.
- Second Violation – The user and Partner Agency will be notified of the violation in writing by the HMIS Lead Agency. The user's license will be suspended for 30 days. The user and/or Partner Agency must take action to remedy the violation; however, this action will not shorten the length of the license suspension. If the violation has not been remedied by the end of the 30-day user license suspension, the suspension will continue until the Partner Agency notifies HMIS Lead Agency of the action taken to remedy the violation. The HMIS Lead Agency will provide necessary training to the user and/or Partner Agency to ensure the violation does not continue.
- Third Violation – The user and Partner Agency will be notified of the violation in writing by the HMIS Lead Agency. The HMIS System Administration Team will immediately suspend all applicable users at the Partner Agency.

## Notification of HMIS Lead Agency of Violations

It is the responsibility of the Agency Liaison or general user at Partner Agencies that do not have an Agency Liaison to notify the HMIS Lead Agency when they suspect that a user or Partner Agency has violated any HMIS operational agreement, policy or procedure.

## Violations of Local, State or Federal Law

Any Partner Agency or user violation of local, state or federal law will immediately be subject to the consequences listed under the Third Violation specified above.

## Multiple Violations within a 12 month Timeframe

During a 12 month calendar year, if there are multiple users (three or more) with multiple violations (two or more) from one Partner Agency, the Partner Agency as a whole will be subject to the consequences listed under the Third Violation specified above.

# Client Rights

## Client Consent

All Partner Agencies may obtain consent from all clients. This consent is to allow sharing of client data with all Partner agencies using HMIS. If a client does not give consent to share their data, the client record must be marked as RESTRICTED and will only be available to the agency originally entering the client's data. Consent is added to the HMIS client record under the "Information Release and Security" section of our HMIS software. This client signature is included in this section and visible on the client dashboard (or home screen) for each client. Once a Partner Agency collects client consent, other partner agencies do not have collect the consent unless the consent period has elapsed.

## Client Access to HMIS Information

All clients with data stored in HMIS have a right to know who has accessed their information and obtain a copy of their electronic file contained within HMIS. Clients must submit a written request for a copy of their record to the Agency Liaison of the Partner Agency receiving the information request. Refer to the Appendices for the location of documentation procedures for providing data access information to clients.

## Filing a Grievance

Clients have the right to file a grievance with the HMIS Lead Agency staff about any HMIS Partner Agency related to violations of data access in HMIS, violations of HMIS Policies or data discrepancies. Any grievances of a non-HMIS related nature will be forwarded to the CoC Lead Agency for review and follow-up. Refer to the Appendices for the location of documentation procedures for resolving grievances from clients.

## Revoking Authorization for HMIS Data Sharing

All clients who initially agree to participation in HMIS have the right to rescind their permission for data sharing in HMIS with the exception of those who have been entered into a financial assistance project or received services that require documentation. Refer to the Appendices for the location of documentation procedures for revoking authorization of client data sharing.

## Case Notes & Data Discrepancies

Partner Agencies must make corrections to any data in the system requested by a client if the client can prove the data is incorrect. Refer to the Appendices for the location of documentation procedures for correcting data for clients.



## Privacy and Security

The Department of Housing and Urban Development (HUD) requires implementation of security standards. The integrity and security of HMIS cannot be overstated. Given this significance, HMIS must be administered and operated under high standards of data privacy and security. As the HMIS Lead Agency, HSN, the Central Florida Continuum of Care FL-507 HMIS Advisory Committee and Partner Agencies are jointly responsible for ensuring that HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission and destruction of data, comply with HMIS privacy, security and confidentiality policies and procedures. When a privacy or security standard conflicts with other Federal, state and local laws to which the Partner Agency must adhere, the Partner Agency must contact the HMIS Lead Agency to collaboratively update the applicable policies for the partner agency to accurately reflect the additional protections.

### Privacy Plan

The CoC HMIS Advisory Committee will set forth the administrative actions, policies, and procedures required to manage the selection, development, implementation, and maintenance of privacy measures to protect HMIS information. The detailed [Central Florida Continuum of Care FL-507 Privacy Plan](#) is a separate document. Refer to the Appendices for the name and location of this document.

### Security Plan

The CoC HMIS Advisory Committee will set forth the administrative actions, policies, and procedures required to manage the selection, development, implementation, and maintenance of security measures to protect HMIS information. The detailed [Central Florida Continuum of Care FL-507 Security Plan](#) is a separate document. Refer to the Appendices for the name and location of this document.

# Data Requirements

## Minimum Data Collection Standard

Partner Agencies are responsible for asking all clients a minimum set of questions for use in aggregate data analysis. These questions are included in custom assessments that are created by the HMIS vendor and HMIS System Administrators. The required data elements depend on the project. The mandatory data elements in each assessment are displayed in bold text and/or specific text indicating that the field is required.

The Agency Liaison, with the guidance of the Lead HMIS System Administrators, must identify the assessments and requirements for each project. The HMIS Lead agency will properly set up each project in HMIS to ensure accuracy of data collection and abide by Federal and local funding requirements.

Procedures clearly articulating the minimum expectations for data entry for all projects entering data in HMIS will be sent to Agency Liaisons and posted on the CoC website. Agency Liaisons must ensure that the minimum data elements and appropriate project-specific data elements are collected by their system end users.

## Provider/Project Naming Convention

All providers within Central Florida Continuum of Care FL-507 HMIS must be named so that they accurately reflect the type of service carried out by the corresponding Partner Agency project. Details of the provider project naming convention are specified in a separate Google document [2023 Updated Agency and Project Naming Convention](#).

## Data Quality Plan

Data quality is a term that refers to the reliability and validity of client-level data collected in the HMIS. It is measured by the extent to which client data in the system reflects actual information in the real world. To meet the goals set forth by the Central Florida Continuum of Care FL-507 HMIS, it is critical that the HMIS have the best possible representation of reality as it relates to persons experiencing homelessness and the projects that serve them. Specifically, the goal is to record the most accurate, consistent and timely information in order to draw reasonable conclusions about the extent of homelessness and the impact on the homeless service system. To that end, the CoC will assess the quality of our data by examining characteristics such as timeliness, completeness, and accuracy.

Data quality is extremely important to the success of the HMIS and the projects that use this database. It is vitally important to note that HUD monitors the quality of the HMIS data through CoC participating projects by the AHAR (via LSA data), System Performance Metrics and NOFO.

If the quality of the data in HMIS is poor, HUD may refuse to provide funding or reduce future funding. Consequently, if this happens, these funding cuts could negatively affect project(s) across Central Florida Continuum of Care FL-507. Since it is vital that the data is correct, HMIS Agency providers and the HMIS Lead Agency Staff must be working diligently to adhere to HUD data standards in order to ensure all reports are comprehensive, consistent, accurate, and timely across the entire HMIS implementation.

Partner Agencies are responsible for the overall quality, accuracy and completeness of data entered by their staff for their clients. HMIS Lead Agency staff will regularly monitor data collection and hold participating agencies accountable for not entering required data or meeting the minimum data standards set forth in the [Central Florida Continuum of Care FL-507 Data Quality Plan](#).

### XML & CSV Imports

HMIS databases are required to have the capacity to accept XML or CSV imports. The HMIS Lead Agency, backed by the HMIS Advisory Committee, reserves the right to not allow XML or CSV imports into the Central Florida Continuum of Care FL-507 HMIS. Allowing XML or CSV imports can impact data integrity and increase the likelihood of duplication of client files in the system.

### HMIS Data Protection

The Homeless Services Network of Central Florida (HSN) is responsible for leading and maintaining the HMIS implementation for the Central Florida Continuum of Care FL-507, to include protecting the data contained in HMIS. In the case where the CoC is made aware through data contained in HMIS, that Partner Agency project funds were used for an ineligible service, the CoC will notify the Partner Agency about the misuse of funds. If the Partner Agency fails to rectify the misuse of funds in a timely fashion, the CoC will notify the appropriate funding body.

### Data Reporting Parameters and Guidelines

All open data will be handled according to the following classifications: Public Data, Internal Data, and Restricted Data. The detailed process for data reporting is included in the [CoC FL-507 HMIS Security Plan](#), under the section labeled "Data Release Process".

## Data Use & Research

The HMIS Lead Agency staff will use data entered into the system for system-wide trend and performance reporting, community planning purposes and for use in research projects. Data within HMIS is strictly for HMIS Partner Agency use and planning of service delivery in our community. All data uses will adhere to the policies outlined below.

### CoC Reporting

Data within the HMIS system will be used for FL-507 CoC reporting. This data will be used to assist clients accessing services, provide in-depth case management to clients for reaching self-sufficiency in permanent housing, to understand the impact of services on clients, and the impact our service providers are making on improving our community. Additionally, data will be used to report and evaluate providers' performance on local contract objectives and local continuum requirements set by State and Federal Agencies. All data used for these purposes will be aggregated. No client-level personal identifiable data is used outside the constraints of the HMIS system without proper authorization from the client and the service provider.

### Research Projects

Data can be used by research entities outside of the CoC only under contract between the CoC, the HMIS Lead Agency and the research entity. The written agreement must:

- Outline the scope of the research project;
- Outline the data elements required for analysis;
- Outline a time line for data use;
- Identify who will have access to client-level personal identifiable data during the project;
- Require that the recipient of data formally agree to comply with all terms and conditions of the agreement;
- Establish rules and limitations for the processing and security of client-level personal identifiable data during the course of the research;
- Provide for the return or proper disposal of all client-level personal identifiable data, except where required by law.
- A written research agreement is not a substitute for approval of a research project by an institutional Review Board (IRB), Privacy Board or other applicable human subjects' protection institution.
- The only exception to this rule is in instances where a local government entity has a written contract with a Partner Agency that already includes language where their data can be used for research purposes. If this is the case, it is the responsibility of the local government entity to notify the Partner Agency and the CoC Lead Agency about the extraction and use of HMIS data.

### Data Use Restrictions

Partner Agencies will not violate the terms of use of HMIS data. This includes breaches to system confidentiality for any purpose outside of the use of project evaluation, education, statistical and research purposes.

## Solicitation

Partner Agencies shall not use any HMIS data to solicit clients, organizations, or vendors for any reason.

## Selling of HMIS Data

Partner Agencies shall not sell any HMIS client, organization or vendor data for any reason.

## Public Use of HMIS Data

HMIS data can be used to help planners during times of death, disaster, public health emergencies or public safety where clients are at risk. During these instances, HMIS staff will work closely with organizations, public officials, funders, and/or law enforcement to assist clients who are at risk. HMIS staff will only validate information presented to the staff and provide local contact information for the most recent service provider serving the client. HMIS staff will not print out, give an electronic copy of, or disclose any other personal information without a subpoena.

However, in the case of death, HMIS staff will disclose any next of kin information in the system in addition to providing local contact information for the most recent provider serving the client.

## Document History

<b>Date of Revision</b>	<b>Document Version #</b>	<b>Revision Notes</b>
2018/03/24	1.0	First Release of Document
2018/03/30	1.1	Updated Style formatting of document
2022/01/05	1.2	Document revision for 2022 updates
2023/01/04	1.3	Incorporate HUD TA recommended improvements and clarifications
2023/08/21	1.4	Add details about usernames.

## Appendices

This document is called the Central Florida CoC HMIS Policies and Procedures and is stored on the HSN HMIS Team Google drive at the location given below.

**Document Location:** \Shared drives\HMIS\1 - HMIS Governance\1.3 - Finalized Documents for Board Review

**Document Name:** 2023\_03-02\_FL507 CoC\_HMIS Policies & Procedures\_FINAL

Location of other documents referenced within this document:

Format:

Document Title

Document Location:

Document Name:

CoC FL-507 HMIS Data Quality Plan

Document Location: \Shared drives\HMIS\6 - Data Quality\6.1 - Data Quality Plan (for Agency Monitoring)

Document Name: Data Quality Plan 2022-2023

CoC FL-507 HMIS Agency Monitoring Plan

Document Location: \Shared drives\HMIS\1 - HMIS Governance\1.3 - Finalized Documents for Board Review

Document Name: 2023-03-02\_FL507 CoC\_HMIS Monitoring Plan\_FINAL

CoC FL-507 HMIS Privacy Plan

Document Location: \Shared drives\HMIS\1 - HMIS Governance\1.3 - Finalized Documents for Board Review\Privacy Plan

Document Name: 2023-01-11\_FL507 CoC\_HMIS Privacy Plan\_FINAL

CoC FL-507 HMIS Security Plan

Document Location: \Shared drives\HMIS\1 - HMIS Governance\1.3 - Finalized Documents for Board Review \Security Plan

Document Name: 2022-12-29\_FL507 CoC\_HMIS Security Plan\_FINAL

Agency Partner Agreement

Document Location: \Shared drives\HMIS\1 - HMIS Governance\1.3 - Finalized Documents for Board Review

Document Name: 2023-03-02\_FL507 CoC\_HMIS Partner\_Agreement\_FINAL

End User Agreement

Document Location: \Shared drives\HMIS\1 - HMIS Governance\1.3 - Finalized Documents for Board Review

Document Name: 2023-01-06\_FL507 CoC\_HMIS End\_User\_Agreement\_FINAL

### Agency Liaison Agreement

Document Location: \Shared drives\HMIS\1 - HMIS Governance\1.3 - Finalized Documents for Board Review

Document Name: 2023-03-02\_FL507 CoC\_HMIS Agency Liaison Responsibilities\_FINAL

### HMIS Training Manual

Document Location: \Shared drives\HMIS\1 - HMIS Governance\1.3 - Finalized Documents for Board Review

Document Name: TBD

### HMIS License Fees

Document Location: Contact HMIS Team at HSN for access to this document.

Document Name: HMIS Fee Schedule-FY2022-2023

### Agency and Project Naming Convention

Document Location: \Shared drives\HMIS\4 - System Maintenance\4.1 - Project Setup and Admin\4.1.1 - Project Creation and Setup

Document Name: 2022 Updated Agency and Project Naming Convention